

REMARKS

This Amendment is filed in response to the Office Action dated October 31, 2008. Claims 3-5, 7-10, 12-15 and 17-19 are currently pending in this application; claims 18 and 19 are newly added. In the outstanding Office Action, the Examiner rejected pending Claims 3, 4, 9, 10, 12 and 17 under 35 USC, 103(a) as being obvious over JP 11-133490 ("Kazuhisa") in view of US Patent 6,011,929 ("Fuke"), US Patent 6,823,198 ("Kobayashi") and US 6,448,550 ("Nishimura"). Claims 5, 7, 8 and 13-15 stand rejected under 35 USC, 103(a) as being obvious Kazuhisa in view of Fuke, Kobayashi and Nishimura as applied to claims 3, 4, 10 and 12 and further in view of US 2002/0089601 ("Fumio").

For the reasons stated below, Applicant respectfully disagrees with the Examiner's conclusions as to the application of the cited art to the pending claims. Nevertheless, Applicant has amended independent claims 3 and 10 to further distinguish the pending claims from the cited prior art, even as interpreted by the Examiner.

Specifically, Applicant has amended claims 3 and 10 to recite "two LEDs" and "one of the two LEDs, herein defined as a first LED, is disposed in the vicinity of the camera module relative to a first line orthogonal to a second line passing through the center of a lens surface of the camera module and the other LED herein defined as a second LED." Support for these amendments is found in the FIGS. 5A and 6A of Applicant's specification. The amendments are further supported by the originally-filed English specification, which describes as an object of the present invention to "provide a flash unit...which can obtain a sufficient amount of flash light" by using an LED. Further, a first embodiment is described using a single

piece of LED, a second embodiment of the present invention uses two LEDs as shown in the originally-filed FIGS. 5A and 6A to increase light amount emitted from the LEDs.

As shown in Figs. 5A and 5B, two LEDs (2) are disposed beneath a light condensing plate (3) formed along a lens of a camera module (7). The LEDs (2) disposed beneath the light condensing plate (3) are arranged substantially in a circumferential arrangement on a substrate. This arrangement allows the LEDs to emit a more significant amount of flash light for illuminating an object while preventing the light emitted from the LEDs from dispersing. Specifically, Applicant's published specification explains: "As shown in FIG. 5A, the guide 5 is disposed near two LEDs 2 which serve as light sources. Alternatively, the guide 5 may be disposed so as to contact the LEDs 2. The apertures of the LEDs 2 on the guide 5 are approximately the same as the area for emitting light on the LEDs 2; thus, there is very little light leaking from near the light emitting surface of the LEDs 2." 2005/0162542A1 at [0033].

No prior art cited by the Examiner discloses or suggests the camera device of claim 3 or mobile terminal of claim 10 having the "two LEDs" as described in those claims. Beginning with Kazuhisa, the Examiner acknowledges that Kazuhisa does not disclose two LEDS and does not disclose the arrangement of those two LEDs as claimed. The Examiner asserts Kazuhisa discloses a single LED. The Examiner further acknowledges that Kazuhisa fails to disclose a light condensing plate as claimed. Office Action at 3. The Examiner further acknowledges that Kazuhisa and Fuke fail to disclose the LED being adjacent to the camera module on a substrate. Finally, the Examiner acknowledges that Kazuhisa, Fuke and Kobayashi fail to disclose a camera module and the LED being formed directly on a substrate. Thus, according to the Examiner, Kazuhisa, Fuke and Kobayashi were insufficient to render the previously pending claims obvious.

The Examiner attempted to remedy the acknowledged deficiencies in the disclosures of Kazuhisa, Fuke and Kobayashi by relying on newly cited Nishimura. However, Nishimura is inadequate in several respects. Nishimura is unrelated to the claimed camera device and mobile terminal. Rather, Nishimura is directed to the use of red (R) light, green (G) light and blue (B) light to yield white light and the active monitoring and measurement of the red, green and blue lights to achieve desired spectral characteristics. Accordingly, in Nishimura, a group of three LEDs corresponding to R, G, and B must be uniformly disposed close to one another and mixed for effectively forming the single color of light. In addition, Nishimura teaches the use of photosensors positioned near the LEDs for sensing emitted light in order to achieve and maintain desired spectral characteristics. Noticeably absent from Nishimura is any reference to a camera module disposed on the same substrate carrying the LEDs.

Moreover, Nishimura is not concerned with the overall compactness of a particular device. Rather, Nishimura merely indicates that co-mounting the LEDs and photosensors on the same substrate "may increase manufacturing efficiency."

To further distinguish the claims over the cited prior art, Applicant now makes clear that the claimed camera device and mobile terminal each has "two LEDs" and "one of the two LEDs, herein defined as a first LED, is disposed in the vicinity of the camera module relative to a first line orthogonal to a second line passing through the center of a lens surface of the camera module and the other LED herein defined as a second LED." None of the cited references, including Nishimura, disclose the two LEDs, and their claimed orientations.

Applicant has added new dependent claims 18 and 19, which depend from claims 3 and 10, respectively. New Claims 18 and 19 are supported by FIGS. 2, 4A, and 4B of Applicant's specification.

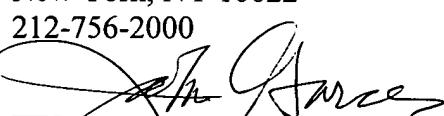
For the foregoing reasons, Claims 3 and 10 are not obvious over the combination of cited prior art. In addition, the dependent claims 4 to 8, and 11, 12 to 15, and 17 to 19 should be allowed for at least the same reasons claims 3 and 10 are allowable over the cited prior art. Applicant respectfully submits that the claims, as amended, are in condition for allowance. Reconsideration and prompt allowance of this application are respectfully requested.

The Examiner is urged to telephone Applicant's undersigned counsel at the number noted below if it will advance the prosecution of this application, or with any suggestion to resolve any condition that would impede allowance. In the event that any extension of time is required, Applicant petitions for that extension of time required to make this response timely. Kindly charge any additional fee, or credit any surplus, to Deposit Account No. 50-0675, Order No. 848075-0075.

Respectfully submitted,

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